



GSP SCHILLER

400 Gosling Road
Portsmouth, NH 03801

By Electronic Mail

December 30, 2020

Damien Houlihan, Section Chief
Industrial Permits Section
U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Re: GSP Schiller Station NPDES Permit No. NH0001473

Dear Mr. Houlihan:

Please allow this letter to serve as an additional response to your letter dated September 28, 2020, which included comments and questions from U.S. Environmental Protection Agency Region 1 (“EPA”) with respect to GSP Schiller LLC’s (“GSP Schiller”) July 30, 2020 wedgewire screen pilot study results submitted pursuant to the compliance schedule in the above-referenced permit. GSP Schiller originally responded to EPA’s September correspondence on November 20, 2020, including a discussion of the alternative compliance schedule process provided in 40 C.F.R. § 122.47(b). Separate from this written correspondence, you and I have had multiple phone conversations in which we further discussed the ineffective wedgewire screen performance on each of the three units during the pilot testing and the current and expected future operational status of the generating units at Schiller Station.

We believe we have provided EPA with all of the information that has been requested and that we have an understanding on the best path forward. All steam units at the facility have been in a long-term outage status with the Independent System Operator of New England (ISO-NE) since June 1, 2020 and remain in that status through May 2021. Accordingly, the underlying operational and environmental conditions on which EPA based its Clean Water Act § 316(b) best technology available (BTA) decision have fundamentally changed, and given the material and substantial changes at Schiller Station and the unknown future outlook for the facility, the company agrees with EPA that the best course of action is for GSP Schiller to timely request a

modification to the NPDES permit, in accordance with 40 C.F.R. § 122.62(a), as we have discussed.

GSP Schiller plans to submit a permit modification request in the first quarter of 2021 seeking an updated BTA determination by EPA. The company is actively evaluating what modification request(s) to include in this submission. One possible option may identify compliance options for Schiller Station's renewable resource, while substantially reducing overall intake flow at Schiller Station. I will reach out to you in the interim, as appropriate, to discuss any questions we may have and/or to talk through potential compliance options.

With respect to the current permit, GSP Schiller will continue to comply with all provisions involving active discharges. Cooling water withdrawals will not resume at the facility prior to the submission of a permit modification request.

Thank you for your time and cooperation in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, reading "Elizabeth H. Tillotson". The signature is fluid and cursive, with the first name "Elizabeth" and last name "Tillotson" clearly legible.

Elizabeth H. Tillotson,
Executive Director- Administration and Regulatory Affairs
Granite Shore Power

Cc: Mark Stein, EPA
James Andrews, GSP Schiller LLC